



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NMA/GMP  
F#.2009R01786

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 6, 2011

**By ECF**

James Froccaro, Esq. (*Att'y for M. Bana*)

Re: United States v. Manny Bana, et al.  
Criminal Docket No. 09-672 (S-1)(NGG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case.

Statements of the Defendant

In June 1997, the defendant was interviewed by Special Agents of the Federal Bureau of Investigation and made the following statements, in sum and substance:

- Bana was introduced to John Madden by Christopher Alviggi. Bana advised that he does not believe he has done anything wrong, but indicated that he said some stupid things to Madden. At the time, Bana believed that Madden was attempting to extort \$50,000 dollars from him.
- Bana indicated he has limited his involvement in the painting industry since his involvement with Madden and the problems he ran into on his New York job sites. Bana currently concentrates on small General Contracting work and tries to avoid union work by only bidding public jobs. Bana indicated that he has recently turned down jobs in an attempt to avoid union problems and the influence of Organized Crime.
- Bana indicated that he is friends with John Zancocchio. Bana became involved with Zancocchio during the incident with Madden. At that time, Bana painted Zancocchio's house and conferred with him regarding the Madden situation.

The government has also recently discovered approximately thirty-two audio recordings of statements made by the defendant and will produce copies of such recordings shortly.

If you have further questions or requests, please contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Nicole M. Argentieri  
Assistant U.S. Attorney  
(718) 254-6232

cc: Clerk of Court (NGG) (by ECF)